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9 **UNITED STATES BANKRUPTCY COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

11 In re:

12 **PG&E CORPORATION,**

13 **- and -**

14 **PACIFIC GAS AND ELECTRIC COMPANY,**

15 **Debtors.**

- 16 ☐ Affects PG&E Corporation  
17 ☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

18 *\* All papers shall be filed in the Lead Case,*  
19 *No. 19-30088 (DM).*

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**STIPULATION REGARDING  
BRIEFING SCHEDULE AND  
CONTINUED HEARING WITH  
RESPECT TO CLAIM NO. 56868  
(CALIFORNIA DEPARTMENT OF  
HOUSING AND COMMUNITY  
DEVELOPMENT)**

[Related to Dkt. No. 10808]

1 This stipulation (the “**Stipulation**”) is hereby entered into between PG&E Corporation  
2 (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and  
3 reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-  
4 captioned cases (the “**Chapter 11 Cases**”), on the one hand, and the California Department of  
5 Housing and Community Development (the “**Department**”), on the other hand, by and through  
6 their respective counsel. The Reorganized Debtors and the Department are referred to in this  
7 Stipulation collectively as the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and  
8 agree as follows:

9 **RECITALS**

10 A. On January 29, 2019 (the “**Petition Date**”), the Debtors commenced these Chapter  
11 11 Cases in the United States Bankruptcy Court for the Northern District of California (the  
12 “**Bankruptcy Court**”). The Chapter 11 Cases are being jointly administered for procedural  
13 purposes only pursuant to Rule 1015(g) of the Federal Rules of Bankruptcy Procedure.

14 B. On October 10, 2019, the Department filed Claim No. 56868, which asserted a  
15 secured claim in the amount of \$330,432.00 (the “**Claim**”).

16 C. On June 30, 2020, the Court entered the *Order Approving (A) Procedures for Filing*  
17 *Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*  
18 (the “**Omnibus Objections Procedures Order**”).

19 D. On June 17, 2021, the Reorganized Debtors filed the *Ninety-Third Omnibus*  
20 *Objection to Claims (No Legal Liability Claims)* [Docket No. 10808] (the “**Omnibus**  
21 **Objection**”).

22 E. The Omnibus Objection objects to the claim on the basis that it should be reduced  
23 because it is barred in part by certain California statutes of limitations for statutory liability and  
24 penalties (the “**Statute of Limitations Objection**”).

25 F. On July 14, 2021, the Department filed the *California Department of Housing and*  
26 *Community Development’s Response to PG&E’s Objection to Proof of Claim No. 56868* [Docket  
27 No. 10918] (the “**Response**”).

1 G. The Omnibus Objection is currently set for hearing on July 28, 2021, at 10:00 a.m.  
2 (Pacific Time) (the “**Hearing**”).

3 H. The Parties met and conferred and agreed upon a schedule regarding further briefing  
4 and continuing the Hearing with respect to the Statute of Limitations Objection as it relates to the  
5 Claim.

6 I. The Parties agree that there are no issues of fact for the Court to determine in order to  
7 adjudicate the Omnibus Objection with respect to the Statute of Limitations Objection, and that no  
8 evidentiary hearing will be necessary.

9 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**  
10 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**  
11 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**  
12 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT**  
13 **TO ORDER, THAT:**

14 1. On or before August 31, 2021, the Reorganized Debtors shall file a reply in support  
15 of the Statute of Limitations Objection to the Claim, not to exceed 25 pages.

16 2. On or before September 7, 2021, the Department shall file a sur-reply in support of its  
17 Response, not to exceed 15 pages.

18 3. The Hearing shall be continued to September 14, 2021, at 10:00 a.m. (Pacific Time),  
19 where the Parties will be prepared for oral argument on the Statute of Limitations Objection.

20 4. No evidentiary hearing on the Statute of Limitations Objection will be set without  
21 further order of the Court.

22 5. The Parties reserve all rights, arguments, and defenses with respect to the Claim,  
23 including with respect to any other grounds on which the Reorganized Debtors may object to the  
24 Claim apart from the Statute of Limitations Objection.

25 6. The Court shall retain jurisdiction to resolve any disputes or controversies arising  
26 from this Stipulation or any Order approving the terms of this Stipulation.

27 *[Signatures on Next Page]*  
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Dated: July 20, 2021

Dated: July 20, 2021

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*/s/ Jane Kim*

*/s/ Erica B. Lee*

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*Attorneys for the California Department of  
Housing and Community Development*